

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Juan Arboleda :
DEBTORS : BANKRUPTCY NO. 18-11840

MOTION TO MODIFY PLAN POST-CONFIRMATION

Juan Arboleda, through his attorney, Gary E. Thompson, Esquire, hereby moves for a Modification of their Chapter 13 Plan Post-Confirmation, and sets forth in support thereof the following:

1. Debtor filed a voluntary Chapter 13 Petition on March 19, 2018, the Chapter 13 plan was confirmed on July 3, 2019.
2. The Confirmed Plan was a 60 Month Plan with payments totaling \$52,706.00, which included, among other items, payments to Pennymac for mortgage arrears and miscellaneous tax debt, with pro-rata to Unsecured Creditors
3. Since the date of Confirmation, Debtors have entered into a Loan Modification Plan which cures the arrears on the mortgage with Pennymac.
4. The Plan needs to be modified so no future payments go to the mortgage company and any other Secured or Priority Creditors as they are now current and/or paid in full.
5. Trustee will not object to the Court granting the Debtor a Discharge in prior to the aforementioned 60 Month Plan.

WHEREFORE, Debtor requests that their Motion to Amend Plan Post-Confirmation be Granted.

Respectfully submitted,

Gary E. Thompson, Esquire
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